

This is in regards to the FCC ruling regarding unsolicited fax advertisements. The ruling is devastating to membership associations, particularly small associations that rely on frequent and inexpensive communications with their members. Petitions filed by the American Society of Association Executives will help examine the issue. Removing the "established business relationship" qualification from the fax regulations is very damaging to our ability to conduct business, and the increased effort required to collect permissions combined with the expected loss of participation in our activities (as a result of lack of the ability to communicate about them) could reduce income, requiring lay offs in the short term and significant problems over time. We need to know what exactly is commercial in nature, as we consider most outreach educational, even promoting conferences or publications to our members. We are a Chapter of a national organization, which collects our dues and membership forms for us. Written consent to our national association would have to extend to us, or else we would have to implement systems and records we are not equipped to handle.